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September 6th, 2018

Via ECF

Honorable Lorna G. Schofield.
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Flores, Carrasco, et al. v. NYC Pasta and Risotto Co. LLC, et al.;
17-cv-6915 (LGS)

Dear Judge Schofield:

The undersigned writes to ask the Court for guidance regarding the response to the Defendants motion as a matter of law. It is Plaintiffs contention that this motion is premature and should be reserved until the Plaintiffs actually rests their case.

Plaintiffs have yet to call the Defendants as adverse witnesses which will add more material relevant to this application.

Plaintiff has also been working to prepare the memorandum discussed by the parties and the Court during yesterdays proceedings in order to meet the 3 pm deadline set by the Court.

In the event the Court requires a written response by Plaintiffs, the Plaintiffs respectfully request that such a response be filed by tomorrow morning.

Respectfully Submitted,

/s/ Colin Mulholland, Esq.
Colin Mulholland, Esq.